

3. The sample computer report (exhibit DD) does not show the total of the drums stored nor does it make a special notation for the total of free-liquid drums. How does this help to avoid exceeding the 350 drum maximum free-liquids and the 1000 drum maximum total?

B. Section O - Liquid Injection Incinerator - (40 CFR §§270.19 and 264 Subpart O)

1. Cyanides are listed in 40 CFR §261 Appendix VIII and are to be considered as principal organic hazardous constituents (POHCs) for the cyanide waste stream. The test protocol should be written to address this.
2. Submit more than one feed rate in the trial burn plan to represent the range of possible waste flow rates.
3. Provide a description of the operating conditions for the packed tower scrubber including:
  - a. The temperature of the inlet and outlet streams for both the liquid and gas.
  - b. The scrubber water flow rate.
  - c. The monitoring procedures which will be incorporated to insure a constant scrubber water pH and flow rate.
  - d. What intervals or under what conditions the scrubber water will be removed from the closed loop system.
  - e. The analysis methods for the waste scrubber water to determine if it is a hazardous waste.
4. Indicate whether the incinerator ash is a hazardous waste.
5. Provide an incinerator/emissions-control operations and maintenance manual detailing the procedures which the operator must follow. This manual should cover the following topics:
  - a. Start up (cold).
  - b. Shut down.
  - c. Emergency shut down.
  - d. Automatic shut down.
  - e. Re-starting (warm).
  - f. Normal operations.
6. Provide an engineering description of the emissions-control system (packed tower scrubber).